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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

IN RE:

Terrell D. Thomas
Annette L. Thomas

Case No.: 19-05945
Chapter: 13
Hearing Date: 3/23/2020

Debtor(s) Judge David D. Cleary

NOTICE OF MOTION

TO: Marilyn O Marshall, Chapter 13 Trustee, 224 South Michigan Ste 800, Chicago, IL 60604 by electronic notice through ECF
Terrell D. Thomas, Annette L. Thomas, Debtor(s), 21206 Alessandra Dr., Matteson, IL 60443
David M Siegel, Attorney for Debtor(s), 790 Chaddick Drive, Wheeling, IL 60090 by electronic notice through ECF

PLEASE TAKE NOTICE that on the 3/23/2020, at 09:30AM, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge David D. Cleary, Bankruptcy Judge, in the courtroom usually occupied by him/her at the Everett McKinley Dirksen Building, 219 South Dearborn, Chicago, Illinois, room 644 or before any other Bankruptcy Judge who may be sitting in his/her place and stead, and shall then and there present this Motion of the undersigned, a copy of which is attached hereto and herewith served upon you, and shall pray for the entry of an Order in compliance therewith, at which time you may appear is you so desire.

PROOF OF SERVICE

The undersigned, an attorney, hereby certifies that I have served a copy of this Notice along with the attached Motion upon the parties listed above, as to the Trustee and Debtor's attorney via electronic notice on March 11, 2020 and as to the debtor by causing same to be mailed in a properly addressed envelope, postage prepaid, from 7140 Monroe Street, Willowbrook, IL 60527 before the hour of 5:00 PM on March 11, 2020.

/s/ Karl Meyer
Attorney for Movant

Berton J. Maley ARDC#6209399
Rachael A. Stokas ARDC#6276349
Peter C. Bastianen ARDC#6244346
Joel P. Fonferko ARDC#6276490
Brenda Ann Likavec ARDC#6330036
Karl V. Meyer ARDC#6220397
Grant W. Simmons ARDC#6330446
Codilis & Associates, P.C.
15W030 North Frontage Road, Suite 100
Burr Ridge, IL 60527
(630) 794-5300
C&A FILE (14-18-01072)

NOTE: This law firm is a debt collector.

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that I have served a copy of this Notice along with the attached Motion upon the parties listed below, as to the Trustee and Debtor's attorney via electronic notice on March 11, 2020 and as to the debtor by causing same to be mailed in a properly addressed envelope, postage prepaid, from 7140 Monroe Street, Willowbrook, IL 60527 before the hour of 5:00 PM on March 11, 2020.

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/s/ Karl Meyer
Attorney for Movant

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**UNITED STATES BANKRUPTCY COURT
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IN RE:

Terrell D. Thomas
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Debtor(s)

Case No.: 19-05945
Chapter: 13
Hearing Date: 3/23/2020

Judge David D. Cleary

**MOTION TO AUTHORIZE AND/OR ALLOW A LOAN MODIFICATION
AGREEMENT**

NOW COMES U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE, SUCCESSOR IN INTEREST TO BANK OF AMERICA, NATIONAL ASSOCIATION, AS TRUSTEE, SUCCESSOR BY MERGER TO LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR MERRILL LYNCH MORTGAGE INVESTORS TRUST, MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2006-FF1, (hereinafter "Movant"), by and through its attorneys, Codilis & Associates, P.C., and moves this Honorable Court for an entry of an order authorizing and/or allowing the creditor and the debtor(s) to enter into a loan modification agreement, and in support thereof states as follows:

1. This Court has jurisdiction pursuant to 28 U.S.C. §1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois, Eastern Division;
2. The Debtor is indebted to Movant for which the Movant claims a valid security interest in the property commonly known as 21206 Alessandra Drive, Matteson, IL 60443;
3. Enforcement of this security interest has been stayed automatically by operation of 11 U.S.C. §362 of the Bankruptcy Code upon Debtor filing of this petition on 3/6/2019;
4. Movant and Debtor(s) have conducted negotiations to reach an agreement on a modification of the secured loan. The agreement to modify the loan is beneficial to both parties;
5. The original terms of the Mortgage and Note provide for an adjustable interest rate currently calculated at 6.875% on an original principal balance of \$303,920.00 and the current payment amount is \$1,996.54, with the last payment due on ;

6. The new principal balance will be \$275,255.04. The mortgage payment due on 03/01/2020 will be in the new amount totaling, \$920.87, with new interest calculated at 3.625%, which is subject to change due to required escrow. The new maturity date of the Note is 06/01/2054;

7. The debtor(s) and Creditor have agreed to the loan modification as illustrated by the signed modification documents attached as an Exhibit;

8. Movant has incurred attorney fees and/or costs in connection with this bankruptcy proceeding in the amount of \$250.00;

WHEREFORE, U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE, SUCCESSOR IN INTEREST TO BANK OF AMERICA, NATIONAL ASSOCIATION, AS TRUSTEE, SUCCESSOR BY MERGER TO LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR MERRILL LYNCH MORTGAGE INVESTORS TRUST, MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2006-FF1 prays this Court enter an Order authorizing and/or allowing the Creditor and Debtor(s) to continue with the loan modification described herein, allowing the fees described herein to be added to the indebtedness pursuant to the terms of the note and mortgage, and for such other and further relief as this Court may deem just and proper.

Dated this March 11, 2020.

Respectfully Submitted,

Codilis & Associates, P.C.

By: /s/ Karl Meyer

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